

## UNITED STATES DISTRICT COURT

for the  
District of New Jersey

United States of America

v.

AMDIJE TOSKA

Case No.

18-mj-5501 (KMW)

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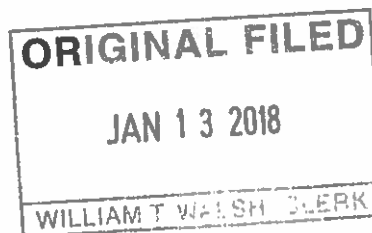
Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 13, 2018 in the county of Camden in the  
District of New Jersey, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 1038(a)	Hoax Bomb Threats (See Attachment A)



This criminal complaint is based on these facts:

See Attachment B (Affidavit)

☒ Continued on the attached sheet.

Complainant's signature

Paul Safier, Deputy U.S. Marshal

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/13/2018

Judge's signature

City and state: Camden, New Jersey

Karen M. Williams, United States Magistrate Judge

Printed name and title

CONTENTS APPROVED  
UNITED STATES ATTORNEY

By:   
ALYSON OSWALD, AUSA

Date:

**ATTACHMENT A**

On or about January 12, 2018, in the District of New Jersey, and elsewhere, the defendant,

AMDIJE TOSKA,

knowingly engaged in conduct with intent to convey false and misleading information under circumstances where such information may reasonably be believed and where such information indicates that an activity will take place that would constitute a violation of chapter 40 of this title, specifically acts that would be violations of 18 U.S.C. § 844(i) (damage to buildings used in interstate or foreign commerce or in any activity affecting interstate or foreign commerce).

In violation of Title 18, United States Code, Section 1038(a).

## **ATTACHMENT B**

I, Paul Safier, am a Senior Inspector for the United States Marshals Service and I have been employed as a Deputy U.S. Marshal for the past 26 years. I am presently assigned to the Trenton Division of the District of New Jersey. I have investigated a variety of federal offenses to include over 100 protective investigations. I have knowledge of the following facts based on my own investigation and discussions with other law enforcement personnel and other individuals, and my review of other evidence involved in this matter. Because this Affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known by the government concerning this investigation. All dates and times ascribed to events herein are approximate. All statements attributed to individuals in this Affidavit are relayed in sum and substance

1. On January 12, 2018, at approximately 9:26 a.m., Clerk-1, a clerk with the United States District Court ("USDC") for the District of New Jersey, advised the United States Marshals Service that she had received a bomb threat via telephone call to the USDC Courthouse in Camden, New Jersey (the "federal courthouse") from an individual known to her as AMDIJE TOSKA. AMDIJE TOSKA is a civil litigant with a case assigned to a USDC Judge in Camden. On November 21, 2017, the Judge assigned to TOSKA's case issued an order directing TOSKA to cease all communications with the Clerk's Office and permitting the Clerk's Office to disconnect future calls from TOSKA.<sup>1</sup>

2. At approximately 9:28 a.m., a Court Security Officer in the federal courthouse notified Department of Homeland Security, Federal Protective Service ("FPS") Mega center of the bomb threat. There were no FPS K-9's available and FPS contacted their federal partners and the Camden County Police for assistance.

3. At approximately 9:50 a.m., a Deputy U.S. Marshal, along with officers from the Federal Protective Service, interviewed Clerk-1 at the Clerk's office regarding the bomb threat. Clerk-1 stated that another clerk in the

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<sup>1</sup> Prior to this order, on November 21, 2017, TOSKA called the Judge's chambers and began a profanity-laced tirade. The Court instructed her to refrain from calling chambers and disconnected the call. Minutes later, TOSKA called chambers again, continuing to engage in improper and vulgar communications. Clerk's Office IT staff then blocked TOSKA's cellphone number ending in 1020 from all chambers' phone lines. On November 22, 2017, the following post appeared on a Facebook account in the name of "Amiee Toska," "Oh shit Camden courts blocked me from calling. Whatever, I will call the other courts and tell them to thank Camden courts for all my calls. No justice, No peace, I stole two guys umbrellas today. Haha, I'm raising hell until i get justice."

office, Clerk-2, received the initial phone call from TOSKA. Clerk-2 stated he received a phone call from TOSKA around 9:15 a.m. and she wanted to speak to a "lady". Clerk-2 terminated the phone call in accordance with the Court's order referenced in paragraph 1 because Clerk-2 recognized the caller as TOSKA.

4. Clerk-1 stated she received a phone call from TOSKA at approximately 9:24 a.m., and TOSKA stated that there was a bomb in the building. Clerk-1 stated that she recognized TOSKA's voice from previous telephone calls and face-to-face interactions in the Clerk's office.

5. At 9:55 a.m., Clerk-1 received another phone call from TOSKA, who stated, in sum and substance, there's a bomb in the building, run. Clerk-1 addressed TOSKA by name asked TOSKA why was she doing this and TOSKA responded, in sum and substance, run there's a bomb in the building, and then TOSKA terminated the phone call. The Deputy United States Marshal who interviewed Clerk-1 was present in the Clerk's office speaking to another deputy clerk and Court Security Officer when this second threat happened. Additionally, a review of telephone records revealed a series of telephone calls from the number ending in 1020 to the Clerk's Office during the relevant time period of the threats. The telephone number ending in 1020 is a cellular telephone and an instrumentality of interstate commerce.

6. Because of the threats, bomb detecting K-9 units from the Camden County Police, U.S. Park Service (Philadelphia Office) and Camden County Sheriff's Office responded to the federal courthouse. At approximately 11:04 a.m., a K-9 search of the exterior of the federal courthouse was conducted with negative results. At approximately 11:26 a.m., a K-9 search of the interior of the building commenced and concluded at 12:07 p.m., with negative results.

7. At approximately 2:15 p.m., Clerk-1 received another telephone bomb threat to the federal courthouse from the same individual whose voice she recognized as TOSKA. Clerk-1 again addressed TOSKA by name and asked TOSKA why she was making bomb threats and TOSKA stated words to the effect of the Judge is torturing me, so I am torturing you, an eye for an eye.<sup>2</sup> As set forth previously in this Affidavit, TOSKA is a civil litigant with a case before a Judge in the federal courthouse.

8. Law enforcement is aware of additional phone calls of a suggestive and harassing nature made by TOSKA to the Camden federal courthouse on January 12, 2018.

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<sup>2</sup> Clerk-1 has personally interacted with TOSKA on multiple occasions and is familiar with her voice from their in-person meetings. In or about May 2017 and June 2017, TOSKA was appearing at the federal courthouse on a frequent basis. Additionally, during one of the calls on January 12, 2018, Clerk-1 addressed TOSKA by name.

9. Additional investigation revealed that at approximately 9:20 a.m. on January 12, 2018, officials in the Hughes Justice Complex in Trenton, New Jersey received a threatening call from a female indicating that there was a bomb in the building. As a result of this call, officials at the Hughes Justice Complex ordered employees to evacuate the building. This threatening call to the Hughes Justice Complex was placed from the telephone number ending in 1020 referenced previously in this Affidavit and used by TOSKA. Telephone toll records associated with the telephone number ending in 1020 confirmed this call.

10. On January 12, 2018, the Facebook account in the name of "Amiee Toska" posted "I have had enough of being ignored I am prank calling the entire world." Additionally, on January 12, 2018 a Twitter account believed to be associated with TOSKA, based on the nature of the account's posts referring to her Camden court case and the account's use of TOSKA's name in the first person in certain tweets posted several "replies" to another twitter account. One "reply" stated "I just called Doj in DC, Camden courts and Njtpd lawyer and told them there's a bomb in the building then I hung up...There is no bomb but I will continue to scare them until I am heard...I want JUSTICE DAMMIT." Another "reply" stated "I'm not gonna stop calling the courts/doj/or njt lawyer and telling them there's a bomb in the building. I will make them suffer by getting them scared. Let them shit in their pants for days. Idgaf....I want JUSTICE."

11. The federal courthouse and the Hughes Justice Complex are buildings, the activity of which affects interstate and foreign commerce.

12. Based on the content of this affidavit, the Affiant respectfully submits that probable cause exists to support the issuance of a Complaint and arrest warrant for AMDIJE TOSKA.

13. It is further requested that this complaint and accompanying Affidavit be sealed until further order of the Court. These materials discuss an ongoing criminal investigation. The public disclosure of this complaint and the accompanying Affidavit could result in the flight of the defendant, who is currently not in custody, or otherwise jeopardize the investigation if the defendant becomes aware of the existence of these materials prior to the effectuation of her arrest.